

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ALLAN RAMOS SOTO,

Plaintiff,

v.

SYNOVOS PUERTO RICO, LLC,

Defendant.

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CIVIL NO. 18-1603 (ADC)

RE: EMPLOYMENT RIGHTS

PLAINTIFF DEMANDS
TRIAL BY JURY

PLAINTIFF'S MOTION FOR FINAL BRIEF EXTENSION OF TIME
TO RESPOND TO DEFENDANT'S RULE 12 MOTION TO DISMISS

TO THE HONORABLE COURT:

COMES NOW Plaintiff, by and through the undersigned attorney, and respectfully requests a final brief extension of time to respond to Defendant's Motion to Dismiss, as follows:

1. On January 17, 2019, Plaintiff requested, and, on January 23, 2019, this Court granted him until today, January 4, 2019, to oppose Defendant's Motion to Dismiss. See, Docket Nos. 10, 11.

2. Plaintiff has been diligently working on his brief, which is at an advanced stage, but notwithstanding his efforts he will not be able to finish it by today.

3. Plaintiff needs a final extension of four days to finish and file his opposition to the dispositive motion in question.

4. Plaintiff respectfully submits that this extension of time will not cause any prejudice to Defendant nor delay pending proceedings, and that the same is requested in order to enable him to file a complete, adequate and responsible opposition to the motion to dismiss.

WHEREFORE, Plaintiff respectfully requests a final four-day extension, to expire on February 8, 2019, to oppose Defendant's Motion to Dismiss.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 4th day of February, 2019.

I HEREBY CERTIFY that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Defendant's counsel of record.

S/José F. Quetglas-Jordán
USDC-PR #203411

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